IN THE UNITED STATES DISTRICT COURT FOR THE STATE OF ALASKA AT ANCHORAGE

SALLY C. PURSER,)
Plaintiff,))
)
VS.)
JOSEF F. BOEHM, ALLEN K. BOLLING and BAMBI TYREE)))
Defendant.) () Case No. 3:05-CV-00085-JKS ()

PLAINTIFF'S SECOND SET OF DISCOVERY REQUESTS

Pursuant to Federal Rules of Civil Procedure 26 and 33, the Plaintiff requests that Defendant Boehm answer the attached interrogatories it writing and under oath within thirty (30) days from the date of service. Pursuant to Federal Rules of Civil Procedure, 26(c) you are requested to supplement your answers if you become aware that the answers given are incorrect, misleading or incomplete.

DEFINITIONS

Unless the question conclusively indicates otherwise, the following definitions apply to the words used in these interrogatories:

- A. Person: The term "person" includes a corporation, partnership, other business association or entity, a natural person, and any government or government body, commission, board, or agency.
- B. Document: The term "document" is defined to mean and include any and all graphic or physical representations, including without limitation all handwritten, typed

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ARCHOISANGE ALASKA 99861 PAY 1887 278 1912 FAX 1900 FEATURE

or printed material, photographs, copies of all the foregoing, and material stored on tape or any other magnetic medium.

- C. Identification of Documents: When you are requested to "identify" a document, you are requested to provide the following with regard to each document:
- (1) A description of the document with sufficient particularity to enable the custodian of the document to respond to a request for production or subpoena duces tecum for the document:
- (2) The name, business address, residence address, telephone number, and occupation of the present custodian of the document;
 - (3) The date on which such document was first prepared; and,
- (4) The name, business address, residence address, telephone number, and occupation of each person who prepared or signed the document.
- Identification of Natural Person: When you are requested to "identify" a D. natural person, you are requested to provide the following with regard to each such person:
 - (1) The name of the person:
 - (2) The business address of the person;
 - (3) The residence address of the person:
 - (4) The business telephone number of the person:
 - (5) The residence telephone number of the person,
 - (6) The occupation of the person and the name of the employer of the person, if any.

- (1) Whether the entity is a corporation, partnership, joint venture. or other type of entity:
- (2) If the entity is a partnership or joint venture:
 - (I) identify each partner or joint venturer;
 - (ii) state whether he or she is a limited or general partner; and,
 - (iii) specify the date on which the partnership or joint venture was formed:
- (3) If the entity is a corporation:
 - (I) identify each of the current officers of the corporation;
 - (ii) state the date of incorporation:
 - (iii) identify the State in which the corporation is incorporated.

SECOND REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1. Please produce a copy of all the transcripts prepared on your behalf during your Federal Criminal Trial, Case Number A04-003-001 CR (JWS) and/or all transcripts prepared for the purpose of your criminal appeal to the 9th Circuit Court of Appeals based in San Francisco.

ANSWER:

109 W. 61H AVENUE, SUITE 200 ATTORNEY AT LAW

Filed 02/01/2007 Page 4 of 6

DATED this $\frac{\sqrt{K}}{\sqrt{K}}$ day of November 2006 at Anchorage, Alaska.

Dafryl L. Jones, Esq. AK. Bar No. 8811188

ATTORNEY AT LAW 109 W. 6TH AVENUE, SUITE 200 JARRYL L. JONES

- 4 -

Darryl L. Jones, Esq. 109 W. 6 th Avenue, Suite 200 Anchorage, AK 99501 Tel (907) 278-1212 Fax (907) 278-1213	
Attorney for Plaintiff	
IN THE U	NITED STATES DISTRICT COURT
t:	DISTRICT OF ALASKA
:	
Salley C. Purser,)
Plaintiff,)
V.)
Josef F. Boehm, Allen K. Bolling, and Bambi Tyree,)))
Defendants.)
) Casa No. 105 0085 / 11/0:

CERTIFICATE OF SERVICE

This is to certify that on the 9TH th day of November, 2006, a true and correct copy of the foregoing document was caused to be mailed to the following parties of record via United States [Certified Mail:

Allen K. Bolling
Inmate No: 14911-006
USP Terre Haute
U.S. Penitentiary
P.O. Box 12015
Terre Haute, IN 47801

CM No.: 7006 0810 0000 2976 8402

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Bambi Tyree c/o Mary Pate 425 G Street, Suite 930 Anchorage, Alaska 99501 CM No: 7006 0810 0000 2976 8419

Josef Bochm c/o David Kenner Kenner Law Firm 16000 Ventura Blvd., Ste.1208 Encino, CA 91436 CM No: 7006 0810 0000 2976 8426

Pamela Sullivan Wade, Kelley & Sullivan 733 W. 4th Avenue, Suite 200 Anchorage, Alaska 99501 CM No: 7006 0810 0000 2976 8433

DATED this 9th day of November, 2006 at Anchorage, Alaska.

Deborah Fenton

, Legal Assistant to Darryl L. Jones, Esq.

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